

Application No. 09/715,935

REMARKS

Claims 18, 20-38 and 62-73 are pending. Applicant thanks the Examiner for providing comments in the Advisory Action of February 14, 2008. To Advance Prosecution, Applicant addresses issues raised in the Advisory Action.

Rejection Over Thaler in view of Whitney et al.

Applicant incorporates by reference the arguments in the Amendment After Final of February 6, 2008. With respect to this combination, the Examiner asserted that Applicant's argument that using the apparatus of Thaler in the Whitney apparatus was not convincing because the rejection was based on the Thaler reference in view of Whitney. The Examiner further noted that Whitney teaches moving a substrate and that Thaler teaches the desire to coat a large substrate. With all due respect, this argument falls short for several reasons.

First, Thaler teaches at column 9, lines 34-53 that large objects are coated uniformly and smoothly without moving the substrates as a result of "working at low pressures" and having "a very long mean free path." Therefore, Thaler teaches away from moving the substrate to coat large objects. Furthermore, the references alone and combined do not teach the claimed reactant flow. Therefore, it is not particularly relevant, as asserted by the Examiner, that "it would be readily apparent to one of ordinary skill in the art that the chemical or physical change depends on the reactants used." Neither reference teaches the claimed reactant configuration and composition. Therefore, the combined disclosures cannot and do not teach the claimed reactant configuration and composition. Based on the legal framework of the *KSR* decision, it is not a predictable result to substitute a reactant configuration not taught in the cited references into the teachings of the references. This is simply not a known element in the claimed context. With all due respect, *prima facie* obviousness has not been established.

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CONCLUSIONS

In view of the foregoing, it is submitted that this application is in condition for allowance. Favorable consideration and prompt allowance of the application are respectfully requested.

The Examiner is invited to telephone the undersigned if the Examiner believes it would be useful to advance prosecution.

Respectfully submitted,



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